

LANDMAN CORSI BALLAINE & FORD P.C.

A NEW YORK PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

CHRISTOPHER S. KOZAK

MEMBER

EMAIL: ckozak@lcbf.com

ONE GATEWAY CENTER

22ND FLOOR

NEWARK, NJ 07102

TELEPHONE (973) 623-2700

FACSIMILE (973) 623-4496

www.lcbf.com

120 Broadway

13th Floor

New York, New York 10271

Tel: (212) 238-4800

One Penn Center

1617 JFK Boulevard, Suite

955

Philadelphia, PA 19103

Tel: (215) 561-8540

300 Delaware Avenue

Suite 210

Wilmington, DE 19801

Tel: (302) 514-6901

August 6, 2024

VIA ECF

Hon. Valerie Figueredo

United States Courthouse

500 Pearl Street

New York, New York 10007

FigueredoNYSdchambers@nysd.uscourts.gov

Re: *Brian Joseph Gref v. American International Industries, et al.*
Case No.: 1:20-cv-05589-GBD-VF

Dear Judge Figueredo:

This office represents defendant American International Industries (“A-I-I”) in the above-entitled action. We respectfully submit this correspondence with regard to Plaintiff’s Motion to Dismiss (ECF No. 448), filed on July 31, 2024. As you will recall, this is the matter which was conferenced in-person on July 18, 2024. There are several additional issues that need to be addressed in response to Plaintiff’s Motion.

We have conferred with Plaintiff’s counsel, Olivia Kelly of Simmons Hanly Conroy, regarding a briefing schedule relative to this Motion. We proposed the following briefing schedule:

- **September 13, 2024:** A-I-I Opposition to be filed
- **October 9, 2024:** Plaintiff’s Reply in further support of his MTD to be filed

Plaintiff has not agreed with these dates. We ask the Court to approve the above schedule despite Plaintiff’s lack of consent. Thank you in advance for considering this request.

Respectfully,



Christopher S. Kozak

cc: Olivia Kelly, Esq.